

Marquis Aurbach Coffing

Liane K. Wakayama, Esq.
Nevada Bar No. 11313
10001 Park Run Drive
Las Vegas, Nevada 89145
Telephone: (702) 382-0711
Facsimile: (702) 382-5816
lwakayama@maclaw.com

Venable LLP

Ralph A. Dengler, Esq.
New York Bar No. 2796712
Pro Hac Vice Forthcoming
1270 Avenue of the Americas, 24 Flr
New York, New York 10020
Telephone: (212) 503-0655
Facsimile: (212) 307-5598
RADengler@Venable.com
*Attorneys for WMM, LLC, and
WMM Holdings, LLC*

UNITED STATES DISTRICT COURT**DISTRICT OF NEVADA**

WAG ACQUISITION, L.L.C.,

Plaintiff,

vs.

DATA CONVERSIONS, INC., et al.,

Defendants.

Case Number: 3:19-cv-00489-MMD-CBC

**UNOPPOSED MOTION TO EXTEND
DEADLINE TO SUBMIT JOINT STATUS
REPORT (SECOND REQUEST)**

Pursuant to LR IA 6-1, LR IA 6-2, and LR 26-4, Defendants WMM, LLC and WMM Holdings, LLC (together, "WMM"), by and through their counsel of record, Liane K. Wakayama, Esq., of the law firm of Marquis Aurbach Coffing, and Ralph A. Dengler, Esq., of the law firm of Venable LLP, hereby state as follows:

1. Pursuant to ECF No. 200, WAG and WMM have been working in good faith to prepare and file a Joint Status Report ("JSR"), which was due on October 17, 2019.

2. On October 18, 2019, the Court entered an Order [ECF No. 204] to extend the time period to submit the JSR to October 24, 2019, in order to allow the parties to fully address and potentially reconcile a number of issues in the current working draft of the JSR.

1 3. Due to schedule conflicts between WMM and its counsel, they have been
2 unable to finalize WMM's portion of the JSR but expect to be able to do so soon.

3 4. Out of caution, WMM requests an extension until November 4, 2019, to
4 confirm its portion of the JSR, to meet and confer with WAG to attempt to potentially
5 reconcile a number of issues, and then to finalize and file the JSR.

6 5. WAG does not join in WMM's request for an extension, but WAG does not
7 oppose the request.

8 6. This is the second request for an extension of the JSR deadline, and the
9 request is made in good faith, not for an improper purpose or for purposes of delay.

10 7. Based on the foregoing, WMM submits that good cause exists for this brief
11 extension and respectfully requests that the Court extend the JSR submission deadline to
12 November 4, 2019.

13 Dated this 23rd day of October, 2019

14 MARQUIS AURBACH COFFING

15 By /s/ Liane K. Wakayama

16 Liane K. Wakayama, Esq.
17 Nevada Bar No. 11313
18 10001 Park Run Drive
19 Las Vegas, Nevada 89145

20 VENABLE LLP
21 Ralph A. Dengler, Esq
22 New York Bar No. 2796712
23 *Pro Hac Vice forthcoming*
24 1270 Avenue of the Americas, 24 Flr
25 New York, New York 10020
26 Attorneys for WMM, LLC, and
27 WMM Holdings, LLC

ORDER

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: October 24, 2019

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **UNOPPOSED MOTION TO EXTEND DEADLINE TO SUBMIT JOINT STATUS REPORT (SECOND REQUEST)** with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the 23rd day of October, 2019.

☒ I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Javie-Anne Bauer
An employee of Marquis Aurbach Coffing